

### **III. REMARKS**

Applicant has considered the Office Action with mailing date of November 24, 2006.

Claims 1 to 18 are pending in this application. No amendments have been made. Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant reserves the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

Applicant notes that the filing date quoted in the current Office Action is incorrect. Applicant respectfully requests that the Office correct the filing date from Mar 28, 2003 to Jan 22, 2002. See earlier Office Action which has correct date.

In the Office Action, claims 1, 3 – 6, 8, 10 – 13 and 15 – 17 are rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Pat. No. 5,935,198, hereinafter “Blomgren”. Claim 7 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Blomgren in view of US Pat. No. 5,912,832, hereinafter “Flahie” and US Pat. No. 5,612,710, hereinafter “Christensen”. Claim 18 is rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Blomgren in view of US Pat. No. 5,838,387, hereinafter “Allen”. Applicant submits that the application is in order for allowance based on the following remarks.

#### **REJECTION OF CLAIMS 1-6, 7 and 8-17 UNDER 35 U.S.C. §102(b) and §103(a)**

With regard to the 35 U.S.C. §102(b) and §103(a) rejections over Blomgren independently as primary reference, or in combination with Flahie, Christensen and Allen, Applicant asserts that Blomgren does not teach each and every feature of the claimed invention.

Applicant re-iterate previously presented arguments, with respect to independent claims 1, 8 and 13, that Blomgren does not teach, *inter alia*, reconfiguring each blending unit/module/means by “...bit slicing each multiplier according to the pixel format”. Claim 1. The Office cites, on page 2 of the current Office Action, col. 13, lines 28 – 37 in Blomgren’s disclosure, that the dividing of “... a full-size multiplier ... into smaller sections ...[such that] smaller pixel components may be interpolated simultaneously...” supports rejection of the claims. From this citation, the Office appears to interpret Blomgren’s pixel components as being equivalent to the claimed pixel format. However, Applicant submits that a pixel component is not equivalent to pixel format. Specifically, the term “pixel format” is well known in the art for specifying data information including the bit-size and arrangement/order of the components that form a pixel. (Exhibit A – a print out from <http://msdn2.microsoft.com/en-us/library/system.drawing.imaging.pixelformat.aspx>). To this extent “[e]ach pixel [that] has three color components... and ... alpha(A)”, col. 13, lines 18 – 19 in Blomgren, includes a pixel format denoting the bit-size and the order/arrangement of the components. For example, the two pixels of Format32bppArgb and Format32bppPArgb (Exhibit A) each specify a format of 32 bits per pixel. However, while the color components for forming each pixel includes the components: red, green, blue and alpha, data information of the color components is organized differently, i.e., the pixel formats are different. As such, the Office’s interpretation of Blomgren’s pixel component is not on point with respect to the claimed pixel format.

Applicant further asserts that the graphics interpolator/multiplier (Fig. 9) in Blomgren, col. 13, lines 15 – 38 teaches parallel interpolation/multiplication “... performed on all three color components and ...alpha” but does not disclose the involvement of pixel formats. Even assuming arguendo that Blomgren’s interpolation by division of a full-size multiplier into

smaller sections parallels bit slicing in the claimed invention, Blomgren's disclosure does not include a nexus between division according to pixel components and bit slicing according to pixel format. As such, Blomgren's "principle of dividing a full-sized multiplier based on pixel color components", page 2 of current Office Action, is not equivalent to the claimed invention's "bit slicing according to the pixel format", claim 1. Therefore, the basis for reconfiguration in the claimed invention is different from the parallel interpolation in Blomgren.

With further respect to independent claims 1, 8 and 13, Applicant asserts that none of the secondary references: Flahie, Christensen or Allen cures Blomgren's deficiency. Like Blomgren, the secondary references do not teach or suggest "... bit splicing each multiplier according to the pixel format." Claim 1. To this extent, a person of ordinary skill would not be able to achieve the result of the claimed invention when applying the combined teachings of Blomgren, Flahie and Christensen. Without a likelihood of success, a person of ordinary skill will find no motivation to even consider the interpolation method of the combined references; and hence, no motivation to modify Blomgren.

In view of the foregoing, Applicant respectfully requests that the Office withdraw its rejection and allow the independent claims.

With respect to dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited references do not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection and allow the claims.

#### IV. CONCLUSION

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,



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